

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

EVERETT DE' ANDRE ARNOLD, et al.	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 4:20-CV-
	)	01802
v.	)	
	)	
BARBERS HILL INDEPENDENT	)	JURY TRIAL REQUESTED
SCHOOL DISTRICT, et al.	)	
	)	
Defendants.	)	

**APPENDIX IN SUPPORT OF PLAINTIFF K.B.'S MOTION FOR  
A PRELIMINARY INJUNCTION**

Plaintiff Cindy Bradford, on behalf of her minor son, K.B., submits this Appendix  
in Support of his Motion for a Preliminary Injunction:

<u>Exhibit</u>	<u>Description</u>
1	Declaration of Professor D. Wendy Greene, dated June 29, 2020
1-A	CV of Professor D. Wendy Greene
2	Declaration of K.B., dated May 26, 2020.
3	Declaration of Sandy Arnold, dated May 26, 2020
4	Declaration of Kobe Bradford, dated June 28, 2020
5	Declaration of Cindy Bradford, dated June 28, 2020
6	Declaration of K.B., dated June 28, 2020
7	Declaration of De'Andre Arnold, dated May, 26, 2020
8	BHISD Student Handbook, 2019-2020, as revised on January 6, 2020

- 9 *Barbers Hill High School*, U.S. News & World Report, <https://www.usnews.com/education/best-high-schools/texas/districts/barbers-hill-isd/barbers-hill-high-school-18643> (last visited June 26, 2020)
- 10 *Sterling High School*, U.S. News & World Report, <https://www.usnews.com/education/best-high-schools/texas/districts/goose-creek-cindependent-school-district/sterling-high-school-19141> (last visited June 26, 2020)
- 11 *SAT (Scholastic Assessment Test)*, Barbers Hill Independent School District, <https://www.bhisd.net/departments/curriculum-instruction/advanced-academics/sat-scholastic-assessment-test> (last visited June 26, 2020)
- 12 K.B. Level I Grievance Hearing Form, dated January 27, 2020
- 13 K.B. Level I Grievance Response, dated February 18, 2020
- 14 K.B. Level II Grievance Appeal, dated February 28, 2020
- 15 K.B. Level II Grievance Response, dated June 23, 2020
- 16 Gabrielle Fonrouge, *American-Indian boy banned from school for having long hair*, N.Y. Post (Aug. 24, 2017 2:21 PM) <https://nypost.com/2017/08/24/american-indian-boy-banned-from-school-for-having-long-hair/>
- 17 Letter from Teresa Yeh, Trial Attorney, U.S. Department of Justice, to Superintendent Greg Poole, dated October 17, 2017
- 18 Lena V. Groeger, Annie Waldman, and David Eads, *Miseducation, Is there racial inequality at your school, Barbers Hill Independent School District*, ProPublica (October 16, 2018) <https://projects.propublica.org/miseducation/district/4809450>.
- 19 BHISD Educational Planning Guide, 2017-2018
- 20 Board of Education Local Board Meetings Policy, dated November 21, 2019
- 21 Greg Poole, *Separate is still not equal*, Baytown Sun (Feb. 11, 2020), [http://baytownsun.com/opinion/guest\\_columns/article\\_9a5f7122-4c5d-11ea-95e7-3fd44b314f6f.html](http://baytownsun.com/opinion/guest_columns/article_9a5f7122-4c5d-11ea-95e7-3fd44b314f6f.html)

- 22 Keith Garvin & Tierra Smith, *More Barbers Hill students angered by school dress code, forced to cut their hair as well*, KPRC Houston (Jan. 24, 2020, 9:28 P.M.),  
<https://www.click2houston.com/news/local/2020/01/24/more-barbers-hill-students-angered-by-school-dress-code- forced-to-cut-their-hair-as-well/>
- 23 Tony Fabelo, et al., *Breaking School's Rules: A Statewide Study of How School Discipline Relates to Students' Success and Juvenile Justice Involvement*, Council of State Governments Justice Center/The Public Policy Research Institute, July 2011, available at  
[https://ppri.tamu.edu/files/Breaking\\_Schools\\_Rules.pdf](https://ppri.tamu.edu/files/Breaking_Schools_Rules.pdf)

Dated: June 29, 2020

/s/ Nicholas E. Petree  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on counsel of record on this 29th day of June, 2020.

/s/ Nicholas E. Petree  
Nicholas E. Petree